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REMARKS

Claims 1-21, all the claims pending in the application, stand rejected on prior art grounds. Claims 1, 8, 12, and 17 stand rejected upon informalities. Applicants respectfully traverse these objections/rejections based on the following discussion.

I.   The 35 U.S.C. §112, First and Second Paragraphs, Rejection

Claims 1, 8, 12, and 17 stand rejected under 35 U.S.C. ' 112, first and second paragraphs. Claims 1, 8, 12, and 17 have been amended in order to clarify the claimed invention that is described in the specification. Specifically, claims 1 and 8 have been amended to reflect that the global directory is adapted to provide a common hierarchical addressing scheme (i.e., a common addressing scheme based on a hierarchical scheme) for the first agency and the second agency and to maintain both global addresses and local addresses for the first agency and the second agency (see paragraphs [0024] and [0029]). Additionally, claims 1 and 8 have been amended to reflect that the common hierarchical addressing scheme provides the global addresses by adding to the local addresses additional information that identifies either the first agency or the second agency to which the local address corresponds (see paragraphs [0024], and [0035-0036]). For example, a local address in agency A of 1121 could be assigned a global address of 1121@agcya.exwin.us. Claims 1 and 8 have been further amended to reflect that the central processing unit is adapted to receive from the first agency a message having a global address in the second agency, to substitute a local address corresponding to the global address, and to

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transmit the message to that local address in the second agency (see paragraph [0026]). Thus, by

using the common hierarchical addressing scheme provided by the global directory in the

regional server, each agency's unique addressing scheme remains intact without modification and

only when messages are transmitted to another agency via the regional server is additional

information added to the message (see paragraph [0024]). Specifically, a sender of a message

from one agency adds additional information to the intact local address on the message. The

additional information just identifies another agency to which the message is directed (i.e., a

global address is used to send the message) (see paragraph [0025]). To obtain global addresses,

access to the global directory is provided to the different agencies (see paragraph [0033]).

Similarly, claims 12 and 17 have been amended to reflect that the method uses a common

hierarchical addressing scheme to provide corresponding global addresses for local addresses in a

first agency and a second agency by adding to the local addresses additional information that

identifies either the first agency or the second agency, as referenced above. Additionally, as

claimed in claim 17 a first-level regional server corresponding to the first or second agency can

be identified. These messages are only transferred from a first message switching unit of a first

agency to a regional message server (or through multiple levels of regional servers, as in claim

17), if the message has a global address (see paragraph [0025]). Upon receiving a message with

a global address for a second agency, a regional message server (or first-level regional messge

server corresponding to the second agency) substitutes the local address for the global address

(see paragraph [0026]) and then transfers the message to a second message switching unit of the

second agency.

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The Applicants submit that as amended the claimed features of independent claims 1, 8, 12, and 17 particularly point out and distinctly claim the subject matter of the invention and that those features are described in the cited paragraphs of the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventors, at the time the application was filed, had possession of the claimed invention. In view of the foregoing, the Examiner is respectfully requested to reconsider and withdraw this rejection.

II.   The Prior Art Rejections

Claims 1, 2, 4, 6 and 8-11 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Applicants' Admitted Prior Art (APA), in view of Salazar (U.S. Patent No. 6,073,141) and Brown (U.S. Patent No. 6,014,711). Claims 8-21 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Applicants' Admitted Prior Art, in view of Salazar and Brown and in further view of Kitamura, et al. (U.S. Patent No. 6,247,012), hereinafter referred to as Kitamura. Applicants respectfully traverse these rejections based on the following discussion.

A.   The Rejection Based on Admitted Prior Art, Salazar and Brown

Applicants respectfully traverse this rejection because Salazar is limited to a system that synchronizes database records, such as local directory with a global directory. Similarly, Brown is limited to an apparatus and method for taking a message that was sent to a recipient using one address and one format and translating that message into another format and sending it to completely different address (e.g., taking a voice mail message to a telephone number and

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translating it into email format and sending it to an email address). Neither Salazar, Brown, nor

the applicants' admitted prior art, teach or suggest a number of the patentable features that are

defined by the independent claims 1, and 8. For example, the cited prior art references do not

teach or suggest a regional server of a communication system that has a global directory that is

adapted to provide a common hierarchical addressing scheme for a first agency and a second

agency and to maintain both global addresses and local addresses for the first agency and the

second agency. Nor does the cited prior art teach or suggest that the common hierarchical

addressing scheme provides the global addresses by adding to the local addresses additional

information that identifies either the first agency or the second agency. Therefore, as discussed

in greater detail below, it is the Applicants' position that the independent claims are not taught or

suggested by the combination of the admitted prior art and Salazar.

More specifically, independent claims 1 and 8 define that the global directory is adapted

to provide a "common hierarchical addressing scheme" (i.e., a common addressing scheme based

on a hierarchical scheme) for the first agency and the second agency and to maintain both global

addresses and local addresses for the first agency and the second agency (see paragraphs [0024]

and [0029]). As described in paragraphs [0024], and [0035-0036] and also claimed in claims 1

and 8, the common hierarchical addressing scheme provides the global addresses by adding to

the local addresses additional information that identifies either the first agency or the second

agency to which the local address corresponds. For example, a local address in agency A of 1121

could be assigned a global address of 1121@agcya.exwin.us. To send a message within an

agency, a user simply uses the local address. However, a user in one agency (e.g., a first agency)

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can send a message to a recipient in another agency (e.g., a second agency) by using the global

address (see paragraph [0024-0025]). To obtain the global address the user can access the global

directory to (see paragraph [0033]). As described in paragraphs [0024] and [0026], the message

is sent via the regional server where the central processing unit is adapted to receive the message

with the global address, to substitute a local address corresponding to the global address, and to

transmit the message to that local address in the second agency.

The regional server of the invention was designed to allow officers or responding

emergency units within different agencies that are otherwise unable to communicate to

communicate by sending and receiving messages using existing local agency units (e.g., mobile

radios) and the local host (CAD) system. Each agency chooses the method by which they want

to address their units within their communication system and typically (without the invention)

units can not easily communicate outside their own communication system. Agency address

plans typically reflect their method of operation. For example, local addresses for each unit may

be assigned by agencies as officer badge numbers, as vehicles numbers, as beat plan

representations, as arbitrary numbers, etc. The global directory of the regional server provides a

way for existing agencies to continue using their existing addressing schemes for local users, yet

still participate in the network (see paragraphs [0031]-[0033]). The invention specifically does

not require modification of the existing architecture of any given agency so that the local address

for each of the users (or units) within an agency remains intact. Instead, the invention provides

an additional communication channel that allows messages to be transferred easily and quickly

between agencies.

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Salazar is limited to a system that automatically updates an electronic address book without requiring substantial user intervention (column 1, lines 1-30; column 2, line 66-column 3, line 19). The Applicants' claimed invention on the other hand is specifically related to a communication system that allows communication between units within different addressing schemes and is not a means for automatically updating a database.

Brown is limited to an apparatus and method for taking a message that was sent to a recipient using one address and one format and translating that message into another format and sending it to a completely different address (e.g., taking a voice mail message to a telephone number and translating it into email format and sending it to an email address) (column 4, lines 33-45). Brown teaches using a directory for cross-referencing different addresses corresponding to different types of units (e.g., to cross-reference an e-mail address and a phone number so that a message can be *redirected*. The Applicants' claimed invention on the other hand uses a global directory with a hierarchical addressing scheme that allows a message to be mapped to a specific unit in a communication system of one agency which is otherwise not reachable through an outside communication system of another agency.

Therefore, Applicants submit that the cited prior art does not teach or suggest a regional server of a communication system that has a global directory that is adapted to provide a common hierarchical addressing scheme for a first agency and a second agency and to maintain both global addresses and local addresses for the first agency and the second agency. Nor does the cited prior art teach or suggest that the common hierarchical addressing scheme provides the global addresses by adding to the local addresses additional information that identifies either the

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first agency or the second agency. Therefore, it is the Applicant's position that independent

claims 1 and 8 are patentable over the proposed combination of the admitted prior art, Salazar

and Brown. Further, dependent claims 2-7 and 9-11 are similarly patentable, not only because

they depend from a patentable independent claim, but also because of the additional features they

define. In view of the foregoing, the Examiner is respectfully requested to reconsider and

withdraw this rejection.

B.   The Rejection Based on Admitted Prior Art, Salazar, Brown and Kitamura

Applicants respectfully traverse this rejection because Salazar and Brown are limited, as

described above. Additionally, the applicants traverse this objection because Kitamura is limited

to a network operating system with an internal network (intranet) having a high-level server that

receives information (e.g., business information such as news stories) from both an external

network (e.g., the internet) and from within the intranet and delivers (via lower level servers) that

information in a consolidated manner to client terminals within the intranet based on content.

Therefore, as discussed in greater detail below, it is the Applicants' position that the independent

claims 8, 12, and 17 are not taught or suggested by the combination of the admitted prior art,

Salazar, Brown and Kitamura.

More specifically, neither Salazar, Brown, Kitamura, nor the applicants' admitted prior

art, teach or suggest a number of the patentable features that are defined by the independent

claims 8, 12, and 17. For example, the cited prior art references do not teach or suggest the

regional server of a communication system of independent claim 8 that has a global directory that

is adapted to provide a common hierarchical addressing scheme for a first agency and a second

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agency and to maintain both global addresses and local addresses for the first agency and the

second agency. Nor do the cited prior art references teach or suggest that the common

hierarchical addressing scheme provides the global addresses by adding to the local addresses

additional information that identifies either the first agency or the second agency. Similarly, the

cited prior art references do not teach or suggest methods of transferring messages between a first

agency and a second agency (as claimed in independent claims 12 and 17) that use a common

hierarchical addressing scheme to provide corresponding global addresses for local addresses in

the first and second agencies by adding to the local addresses additional information that

identifies either the first agency or the second agency and, as in claim 17, a first-level regional

server corresponding to the agency.

Kitamura is cited as a reference because neither the admitted prior art, Salazar, nor

Brown, disclose the first and second levels of regional message servers claimed in the

independent claims 8 and 17. The concept of incorporating multiple levels of servers into a

network operating system is known. The novel feature of the invention is that the multiple levels

of servers are adapted for a specific use so that units from different agency with differing

addressing schemes can communicate. Namely, the servers are adapted to provide a common

hierarchical addressing scheme for a first agency and a second agency and to maintain both

global addresses and local addresses for the first agency and the second agency. Kitamura is

limited to a network operating system (see column 6, lines 39-40) with an internal network

(intranet) having a high-level server that receives information (e.g., business information such as

news stories) from both an external network (e.g., the internet) and from within the intranet and

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that delivers (via lower level servers) this information in a consolidated manner to client

terminals within the intranet based on content (see column 3, lines 59-67 through column 4, lines

1-34). Specifically, Kitamura discloses various levels of servers that are located within an

intranet of an agency and are connected at the bottom of the chain to client terminals (see Figure

4 and column 8, lines 31-44). The high level server contains directories of archived information

(column 7, lines 55-64) and as the archives and directories are updated they are passed on to the

lower level servers (see column 9, lines 30-44). A user of a client terminal can access the

directories and download the information through the lower level servers so that it can be

displayed (column 9, lines 59-63). The servers of Kitamura do not provide a common

hierarchical addressing scheme to allow different agencies to communicate despite differing

communication systems and/or addressing schemes.

Therefore, it is the Applicant's position that independent claims 8, 12, and 17 are

patentable over the proposed combination of the admitted prior art, Salazar, Brown and

Kitamura. Further, dependent claims 9-11, 13-16, and 18-21 are similarly patentable, not only

because they depend from a patentable independent claim, but also because of the additional

features they define. In view of the foregoing, the Examiner is respectfully requested to

reconsider and withdraw this rejection.

III.   Formal Matters and Conclusion

In view of the foregoing, Applicants submit that claims 1-21, all the claims presently

pending in the application, are patentably distinct from the prior art of record and are in condition

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for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary.

Please charge any deficiencies and credit any overpayments to Attorney's Deposit Account Number 09-0458.

Respectfully submitted,

Dated: 7/7/05

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